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4 Attorney for the Material Witness(es)

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8 **United States District Court**  
9 **Southern District of California**

10 (Hon. Roger T. Benitez)

11 UNITED STATES OF AMERICA,	)	Criminal Case No. 08CR1455BEN(NLS)
	)	
12 Plaintiff,	)	<b>Stipulation And Joint Motion</b>
	)	<b>For The Release Of A Material Witness</b>
13 v.	)	
	)	
14 ARA E. AVETYANTS, ASHOT BARSEGHIAN,	)	
and ARSEN GRISHAI MOTIVOSYAN,	)	
15	)	
Defendants.	)	
16	)	

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19 **Stipulation**

20 Ara Hakobyan is being detained as a material witness pursuant to 18 USC § 3144, and the  
21 parties agree the testimony of that witness has been adequately secured by a videotaped deposition,  
22 that further detention of this witness is unnecessary, and that it would not cause a failure of justice  
23 to release this material witness at this time.

24 **Joint Motion**

25 Plaintiff United States of America, through its counsel, United States Attorney Karen P.  
26 Hewitt and Assistant United States Attorney Rebecca S. Kanter, and Defendant Ara E. Avetyants  
27 through his counsel, Attorney Garo B. Ghazarian, and Defendant Ashot Barseghian through his  
28 counsel, Attorney Kristin J. Kraus, and Defendant Arsen Grishai Motivossyan, through his counsel,

1 Attorney Jodi D. Thorp, and Material Witness Ara Hakobyan, through his counsel, Attorney Ned  
2 Lynch, jointly move the court to immediately release Material Witness Ara Hakobyan from custody  
3 of the United States Marshal so he may be permitted to return to his home country.

4  
5 Dated: June 27, 2008

s/Ned Lynch

Ned Lynch, Attorney for the Material Witnesses  
E-mail: nedlynch@aol.com

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7  
8 Dated: June 27, 2008

s/Rebecca S. Kanter

Rebecca S. Kanter, Assistant U.S. Attorney  
E-mail: Rebecca.Kanter@usdoj.gov

9  
10  
11 Dated: June 27, 2008

s/Garo B. Ghazarian

Garo B. Ghazarian, attorney for  
Defendant Ara E. Avetyants  
E-mail: gbglaw@sbcglobal.net

12  
13  
14 Dated: June 27, 2008

s/Kristin J. Kraus

Kristin J. Kraus, attorney for  
Defendant Ashot Barsegian  
E-mail: kris\_kraus@fg.org

15  
16  
17 Dated: June 27, 2008

s/Jodi D. Thorp

Jodi D. Thorp, attorney for  
Defendant Arsen Grishai Motivossyan  
E-mail: jodithorp@thorplawoffice.com